

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON JUDICIAL CIVIL FORFEITURE	:	
PROCEEDING REGARDING \$2,726,075, and	:	<u>STIPULATION AND ORDER</u>
\$41,633 IN UNITED STATES CURRENCY	:	
SEIZED ON OR ABOUT APRIL 17, 2020	:	20 Misc. 318 (JSR)
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WHEREAS, on or about April 17, 2020, the Drug Enforcement Administration (“DEA”) seized (i) \$2,726,075 in United States currency from Touch of Class Transportation LLC inside 461 Southard Street, Trenton, NJ; and (ii) \$41,633 in United States currency from Touch of Class Transportation LLC inside 461 Southard Street, Trenton, NJ (collectively, the “Seized Currency”);

WHEREAS, on April 17, 2020 the DEA initiated an administrative forfeiture proceeding against the Seized Currency pursuant to Title 21, United States Code, Section 881, by timely sending written notice of its intent to forfeit the Seized Currency to all known interested parties;

WHEREAS, on or about September 14, 2020, the DEA received a claim from Arrival Enterprise, Inc. (the “Claimant”) asserting an interest in the Seized Currency;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney’s Office, Southern District of New York for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Seized Currency;

WHEREAS, Title 18, United States Code, Section 983(a)(3)(A) provides that, “not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which

the complaint will be filled may extend the period for filing a complaint for good cause shown or upon agreement of the parties;”

WHEREAS, pursuant to Title 18, United States Code, Section 983(a)(3), the United States was required to file a civil complaint to forfeit the Seized Currency no later than December 13, 2020;

WHEREAS, on December 23, 2020, the Court entered a Stipulation and Order, wherein Arrival Enterprise, Inc. (the “Claimant”) through its counsel Renee Wong, Esq., consented to a 60-day extension of the deadline for the Government to file a complaint against the Seized Currency;

WHEREAS, on February 12, 2021, the Court entered a second Stipulation and Order, wherein Arrival Enterprise, Inc. (the “Claimant”) through their counsel Renee Wong, Esq., consented to a 60-day extension of the deadline for the Government to file a complaint against the Seized Currency;

WHEREAS, on April 12, 2021, the Court entered a third Stipulation and Order, wherein Arrival Enterprise, Inc. (the “Claimant”) through their counsel Renee Wong, Esq., consented to a 60-day extension of the deadline for the Government to file a complaint against the Seized Currency;

WHEREAS, pursuant to Title 18, United States Code, Section 983(a)(3), the United States is required to file a civil complaint to forfeit the Seized Currency no later than June 17, 2021;

WHEREAS, the Claimant, through its counsel Renee Wong, Esq., has consented to a further 30-day extension of the deadline for the Government to file a complaint against the Seized Currency;


WHEREAS, Renee Wong, Esq., attorney for the Claimants, represents and warrants that she is authorized to execute this Stipulation on behalf of her client Arrival Enterprise, Inc.; and

WHEREAS, the Government requests an extension of 30 days to file a complaint from June 17, 2021 to July 19, 2021;

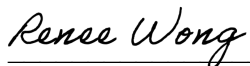
NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the aforementioned parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the time in which the Government is required to file a complaint for forfeiture of the Seized Currency is extended from June 17, 2021, up to and including July 19, 2021.

AGREED AND CONSENTED TO:

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: 
Brett M. Kalikow
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2220

6/10/21
DATE

By: 
Renee Wong, Esq.
Golderberger and Dubin, P.C.
Attorney for Claimant
401 Broadway, Ste. 306
New York, NY 10007

6/10/2021
DATE

SO ORDERED:

HONORABLE JED S. RAKOFF
UNITED STATES DISTRICT JUDGE

DATE